

Pursuant to the FNPRM and FNOI issued 4/15/04, I submit comments in MB Docket 99-325. I reserve the right to file additional comments in this proceeding.

OWNERSHIP ISSUES IN REGARDS TO DAB STATIONS:

I urge the Commission to adopt rules that would halve the number of FM stations that any one owner has in a market if they choose to multicast. For example, if a station owned four FM stations, they would be required to divest down to two stations. That way, if they multicast, they would still have four streams. Any group owner that had odd numbers of stations would have to divest itself of the odd number station (third or higher).

PUBLIC SERVICE AND MULTICASTING

The adoption of multicasting standards to ensure quality signals over the entire service area of a station doing so would provide new opportunities for public service programming. Especially if a way were found to provide FM-quality signals on the secondary channels of an FM digital broadcast. I'd also like to hear if it might be possible to add more than one secondary channel using compression methods similar to what has been done to create digital TV multicasting.

This would allow some DAB stations to broadcast more localized info to their City of License. Also more localized entertainment options as well.

'DATABCASTING', AND 'SUBSCRIPTION SERVICES.

I am opposed to databcasting and subscription services. It might even harm the relationship between the station and listeners. We've been down this road before with Subscription TV in the late 70s and early 80s. All of the then extant subscription TV stations are now gone, all being on the air as regular over-the-air TV stations running normal broadcast programming. Databcasting might also preclude diversity in entertainment and public service programming, by making it impossible to work with a station on a format or two for the additional channels made available.

TRANSLATORS AND LPFMS:

I don't see any real problems with translators and LPFMs using DAB signals. However, the same signal strength in the additioanl streams would have to be maintained in order to make the service effective, in other words, be at at least 90 percent of the station's ERP. That same standard, therefore, would have to be maintained by primary station in the case of the originating signal.